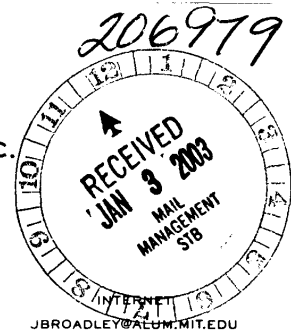


LAW OFFICES  
**JOHN H. BROADLEY & ASSOCIATES, P.C.**

CANAL SQUARE  
1054 THIRTY-FIRST STREET, N.W.  
WASHINGTON, D.C.  
20007

(202) 333-6025  
(202) 333-5685 FAX



January 3, 2003

JOHN H. BROADLEY

Honorable Vernon Williams  
Secretary  
Surface Transportation Board  
1925 K Street, N.W. Suite 700  
Washington, D.C. 20423-0001

**Expedited Handling Requested**

Re: Chelsea Property Owners -- Abandonment--Portion of the Consolidated Rail Corporation's West 30<sup>th</sup> Street Secondary Track in New York, NY. Docket No. AB-167 (Sub-No. 1094)A.

Dear Mr. Williams:

Enclosed for filing in the captioned case is an original and ten copies of the MOTION OF CHELSEA PROPERTY OWNERS FOR ENLARGEMENT OF TIME TO FILE REPLY.

Please file stamp the extra copy of the document and return it with our messenger.

**ENTERED**  
**Office of Proceedings**

**JAN 03 2003**

**Part of  
Public Record**

Yours very truly,

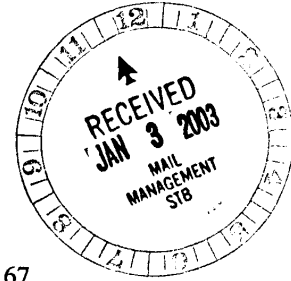
*John Broadley*  
John Broadley

cc: All counsel  
w/enclosure

206979

(Expedited Handling Requested)

BEFORE THE  
SURFACE TRANSPORTATION BOARD  
Washington, D.C.



\_\_\_\_\_  
Chelsea Property Owners -- Abandonment -- )  
Portion of the Consolidated Rail Corporation's )  
West 30<sup>th</sup> Street Secondary Track in New York, NY )  
\_\_\_\_\_ )

Docket No. AB 167  
(Sub-No. 1094)A

ENTERED  
Office of Proceedings

JAN 03 2003

Part of  
Public Record

**CHELSEA PROPERTY OWNERS MOTION FOR ENLARGEMENT  
OF TIME TO REPLY TO NEW YORK CITY'S PETITION TO LATE  
FILE APPLICATION FOR A CITU AND APPLICATION FOR A CITU**

Chelsea Property Owners ("CPO") by its undersigned attorney, hereby moves for an enlargement of time of seven (7) days in which to reply to the City of New York ("City") petition to late file its application for a Certificate of Interim Trail Use ("CITU") and its application for a CITU.

The City filed its petition and application on December 17, 2002.<sup>1</sup> Under the Board's rules CPO's reply is due on January 6, 2003. CPO is requesting an enlargement of time in which to reply of seven (7) days to January 13, 2003. The intervening Christmas and New Years holidays and vacation schedules have delayed preparation of CPO's reply. The additional seven days is necessary to permit completion of the reply in an orderly manner.

Counsel for the City of New York has stated that he has no objection to the requested enlargement.

<sup>1</sup> The served document did not contain one of the exhibits. The missing exhibit was received on December 19, 2002.

WHEREFORE, CPO respectfully requests that its time to reply to the City's petition and application be enlarged by seven days from January 6, 2003 to January 13, 2003.

Respectfully submitted,

CHELSEA PROPERTY OWNERS

By: John Broadley  
One of its attorneys

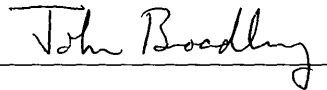
John Broadley  
(DC Bar No. 238089)  
JOHN H. BROADLEY & ASSOCIATES  
1054 31<sup>st</sup> Street NW, Suite 200  
Washington, D.C. 20007  
Tel. 202-333-6025  
Fax 202-333-5685

## CERTIFICATE OF SERVICE

I hereby certify that on this 3<sup>rd</sup> day of January 2003 I served a copy of the foregoing MOTION OF CHELSEA PROPERTY OWNERS FOR ENLARGEMENT OF TIME TO FILE REPLY on Friends of the High Line and the parties to this proceeding by causing a copy thereof to be deposited in the United States mails, postage prepaid, addressed to counsel listed below:

Counsel	Represents
Elizabeth Bradford 655 West 34 <sup>th</sup> Street New York, NY 10001-1188	(NYCCDC)
John F. Guinan New York Department of Transportation Albany, NY 12232	(NYDOT)
Robert M. Jenkins Mayer Brown Rowe & Maw 1909 K Street NW Washington, D.C. 20006-1101	(Conrail)
Dennis G. Lyons Arnold & Porter 555 Twelfth Street NW, Suite 940 Washington, D.C. 20004-1206	(CSX and CSXT)
Joe Gunn Senior Counsel New York City Law Department 100 Church Street Room 3-158 New York, NY 10007	(City of New York)
Anthony P. Semancik 347 Madison Avenue New York, NY 10017-3706	(MTA)
Kimberly Egan Covington & Burling 1201 Pennsylvania Avenue NW Washington, D.C. 20004	(FHL)

Dated: January 3, 2003

  
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